

REMARKS

In the Office Action mailed August 10, 2007, the Examiner noted that claims 1-8 were pending in the application; and rejected claims 1-8 under 35 U.S.C. § 103(a) as being unpatentable over Gatzemeier (U.S. Publication No. 2004/0103390) in view of Cash, Jr. (U.S. Patent No. 6,379,164). Claims 1-8 are currently pending in this case. The rejections are traversed below.

Rejection under 35 U.S.C. § 103

Claims 1-8 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Gatzemeier (U.S. Publication No. 2004/0103390) in view of Cash, Jr. (U.S. Patent No. 6,379,164).

Claim 1 recites "generating and displaying configured function blocks of the electrical system as a first set of representations" and "generating and displaying configured objects as a second set of representations corresponding to the configured function blocks" (lines 2-5). The Applicant respectfully submits that the cited art fails to teach these features.

Gatzemeier is directed to "a software tool for formulating an automation task to be solved" which enables "automation functions to be represented as objects on a display unit" (see paragraph [0002]). Gatzemeier discusses "a software tool for formulating an automation task to be solved, in the form of a programming language for automation devices, which enables automation functions to be represented as objects on a display unit" (paragraph [0006]). A template having "template-specific automation functions" can be "created with a software tool and displayed on a display unit" (paragraph [0013], of Gatzemeier). Later-generated objects contain "template-specific parts, object-specific automation functions...and object-specific connecting lines" (Fig. 1 and paragraph [0014], of Gatzemeier).

Claim 1 recites generating and displaying configured function blocks as a *first set of representations* and configured objects as a *second set of representations*. However, as can be seen in Figs. 1-4 of Gatzemeier and the associated descriptions thereof, all of the components, including "template-specific parts" and "object-specific automation functions", are displayed together. As such, Gatzemeier teaches away from representing configured function blocks and configured objects as different sets of representations. No teaching of these features has been cited or found in Cash, Jr. either.

Claim 1 also recites

converting information formed by said creating and assigning to associate with at least one of the function blocks, a first document formulated in a page description language and containing first references to corresponding configured objects, and to associate with at least one of the configured objects, a second document formulated in the page description language and containing second references to corresponding function blocks

(lines 11-15). The Applicant respectfully submits that the cited art fails to disclose these features.

Gatzemeier discusses "formulating an automation task to be solved, in the form of a programming language for automation devices, which enables automation functions to be represented as objects on a display unit" (paragraph [0006]). The Office Action states on page 2 that "Gatzemeier is fully directed to representing configured block and/or objects on a display using programming language (see para 006)..." However, claim 1 recites documents formulated in a *page description language*. Gatzemeier simply mentions use of a programming language for *automation devices*.

Further, Gatzemeier does not teach converting information associated with a function block into first and second documents formulated in a page description language that correspond to configured objects and function blocks, respectively. As a nonlimiting example, function blocks may, for instance, "refer back to a common database and the information about the corresponding sets of representations of the system's function blocks is converted into two HTML documents each having references to the other set of representations in each case..." (see paragraph [0007] of the application). Gatzemeier is silent as to any such conversion and Cash, Jr. fails to teach these features as well.

Furthermore, it is respectfully submitted that Gatzemeier and Cash Jr. are not analogous art. MPEP § 2141.01(a)(I) states that "In order to rely on a reference as a basis for rejection of an applicant's invention, the reference must either be in the field of applicant's endeavor or, if not, then be reasonably pertinent to the particular problem with which the inventor was concerned" (quoting *In re Oetiker*, 877 F.2d 1443 (Fed. Cir. 1992)).

A reference is reasonably pertinent if, even though it may be in a different field from that of the inventor's endeavor, it is one which, because of the matter with which it deals, logically would have commended itself to an inventor's attention in considering his problem.

(MPEP § 2141.01(a)(I), quoting *Wang Laboratories Inc. v. Toshiba Corp.*, 993 F.2d 858 (Fed. Cir. 1993)). "[T]he similarities and differences in structure and function" carry great weight (see MPEP § 2141.01(a)(II)).

The Office Action states on page 4 that "Cash, Jr. and Gatzemeier are analogous art because they are from the same field of endeavor and that the system and method teaches by Cash, Jr. is similar to that of Gatzemeier." However, this is not the case. Gatzemeier is directed to "a software tool for formulating an automation task to be solved" (paragraph [0002]). Cash, Jr., on the other hand, is directed to "a wiring system for providing electrical service to a structure [that] allows all electrical service ports" (column 3, lines 15-17). Cash, Jr. discusses "a processor communicating with either a single electrical receptacle or a plurality of electrical receptacles that communicate with the edifice wiring system through at least one electrified buss in series connection with junction boxes" (column 6, lines 24-28). The MPEP indicates that differences in structures or functions carry great weight in a determination of whether two references are analogous art. Gatzemeier is silent as to the structures and functions discussed in Cash, Jr. Further, nothing has been cited or found that demonstrates whether it is possible to combine the automation system of Gatzemeier with the system for configuring electrical receptacles of Cash, Jr. Thus, Gatzemeier and Cash, Jr., both individually and in combination, fail to render claim 1 unpatentable under 35 U.S.C. § 103(a).

Claims 2 and 3 depend from claim 1 and add further limitations thereto. Thus, the arguments above with respect to claim 1 also apply to these claims.

Claim 4 recites "generating a graph from sets of representations of node function blocks and connection function blocks of the electrical system, the graph having only nodes corresponding to the node function blocks and references to the nodes" (lines 3-5). The Office Action asserts on page 3 that Figs. "3-4 are a graph and [F]ig. 5 further shows a table used for generation of a graph." However, Gatzemeier explicitly states that "FIG[S]. 3 and 4 ... depict an SFC view of automation functions for solving an automation task" (paragraph [0017]). As discussed in Gatzemeier, "programming languages in the form of Continuous Function Chart (CFC) or Sequential Function Chart (SFC), are provided in a programming device for formulating an automation task to be solved" (paragraph [0003]). As such, the illustrations in Figs. 3 and 4 of Gatzemeier are illustrative of automation functions, not a graph. Further, there is nothing cited or found in Gatzemeier that teaches or suggests representing function blocks as nodes. Thus, Gatzemeier and Cash, Jr. both individually and in combination, fail to teach the features of claim 4.

Claims 5-7 depend from claim 4 and add further limitations thereto. Thus, the arguments above with respect to claim 4 also apply to these claims.

Claim 8 recites "generating a first document referring to configured objects and a second document referring to function blocks using the mapping" (lines 7 and 8). Per the arguments above with respect to claim 1, Gatzemeier and Cash, Jr. fail to teach generating first and second documents referring to function blocks and configured objects, respectively. Thus, claim 8 also patentably distinguishes over the cited art.

In view of the above, it is respectfully submitted that the rejection is overcome

Summary

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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